

EXHIBIT G

From: Matthew L. Schwartz
Sent: Tuesday, January 23, 2018 12:36 PM
To: Mermelstein, Rebecca (USANYS); Quigley, Brendan (USANYS)
Cc: Tekeei, Negar (USANYS)
Subject: RE: Archer

Rebecca –

We understand one another's positions, although to be clear, by saying that Mr. Archer has no obligation to produce additional documents pursuant to your subpoena I am not acknowledging, implicitly or otherwise, that Mr. Archer is withholding anything.

For present purposes, however, I am simply asking the government to identify specific documents it is claiming that Mr. Archer withheld, presumably on the basis that you received those documents from other sources such as from execution of the SW. As I said, it would not be appropriate for the government in reply to point to additional specific examples that we were not provided notice of.

-mls

Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
212-303-3646 (Direct)
646-337-5787 (Mobile)

From: Mermelstein, Rebecca (USANYS) [mailto:Rebecca.Mermelstein@usdoj.gov]
Sent: Tuesday, January 23, 2018 12:20 PM
To: Matthew L. Schwartz; Quigley, Brendan (USANYS)
Cc: Tekeei, Negar (USANYS)
Subject: RE: Archer

Matt,

We have reason to believe that your production was incomplete. You have taken the position that your obligations pursuant to the GJ subpoena ended at the time of Indictment, which we understand to be an implicit acknowledgment that you have responsive documents you have not produced.

We are obviously unable to provide you with a comprehensive list of documents that are in your possession, but which you have failed to produce, since you may well have documents of which we are entirely unaware.

Best,

Rebecca

From: Matthew L. Schwartz [mailto:mlschwartz@BSFLLP.com]
Sent: Tuesday, January 23, 2018 12:12 PM
To: Mermelstein, Rebecca (USANYS) <RMermelstein@usa.doj.gov>; Quigley, Brendan (USANYS) <BQuigley@usa.doj.gov>
Cc: Tekeei, Negar (USANYS) <NTekeei@usa.doj.gov>
Subject: RE: Archer

Can you please provide a comprehensive list? For obvious reasons, it would not be fair for the government to provide additional new examples on reply.

From: Mermelstein, Rebecca (USANYS) [mailto:Rebecca.Mermelstein@usdoj.gov]
Sent: Tuesday, January 23, 2018 12:07 PM
To: Matthew L. Schwartz; Quigley, Brendan (USANYS)
Cc: Tekeei, Negar (USANYS)
Subject: RE: Archer

That was merely an example.

From: Matthew L. Schwartz [mailto:mlschwartz@BSFLLP.com]
Sent: Tuesday, January 23, 2018 11:46 AM
To: Quigley, Brendan (USANYS) <BQuigley@usa.doj.gov>
Cc: Mermelstein, Rebecca (USANYS) <RMermelstein@usa.doj.gov>; Tekeei, Negar (USANYS) <NTekeei@usa.doj.gov>
Subject: RE: Archer

Thank you. Are there any other documents the government claims Mr. Archer failed to produce, or is that the only one?

Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
212-303-3646 (Direct)
646-337-5787 (Mobile)

-----Original Message-----

From: Quigley, Brendan (USANYS) [mailto:Brendan.Quigley@usdoj.gov]
Sent: Monday, January 22, 2018 11:41 AM Eastern Standard Time
To: Matthew L. Schwartz
Cc: Mermelstein, Rebecca (USANYS); Tekeei, Negar (USANYS)
Subject: RE: Archer

Matt-

The Bates number is SearchWarrant_v2_00021900.

From: Matthew L. Schwartz [mailto:mlschwartz@BSFLLP.com]
Sent: Monday, January 22, 2018 4:52 AM
To: Quigley, Brendan (USANYS) <BQuigley@usa.doj.gov>

Cc: Mermelstein, Rebecca (USANYS) <RMermelstein@usa.doj.gov>; Tekeei, Negar (USANYS) <NTekeei@usa.doj.gov>
Subject: RE: Archer

Brendan, et al —

Could you please provide a copy of and/or identify by Bates number the e-mail referenced in page 19 of the government's motion — the e-mail you say Mr. Archer failed to produce — along with any other documents you have identified that you claim Mr. Archer has failed to produce? Thanks.

-mls

Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
212-303-3646 (Direct)
646-337-5787 (Mobile)

-----Original Message-----

From: Matthew L. Schwartz
Sent: Sunday, January 21, 2018 09:55 PM Eastern Standard Time
To: Quigley, Brendan (USANYS)
Cc: Mermelstein, Rebecca (USANYS); Tekeei, Negar (USANYS)
Subject: RE: Archer

A copy is attached. A corrected version of my declaration with all attachments will be filed on Monday.

-mls

From: Quigley, Brendan (USANYS) [<mailto:Brendan.Quigley@usdoj.gov>]
Sent: Saturday, January 20, 2018 7:23 PM
To: Matthew L. Schwartz
Cc: Mermelstein, Rebecca (USANYS); Tekeei, Negar (USANYS)
Subject: RE: Archer

Your client's declaration would be helpful. Thanks.

From: Matthew L. Schwartz [<mailto:mlschwartz@BSFLLP.com>]
Sent: Friday, January 19, 2018 10:05 PM
To: Quigley, Brendan (USANYS) <BQuigley@usa.doj.gov>
Cc: Mermelstein, Rebecca (USANYS) <RMermelstein@usa.doj.gov>; Tekeei, Negar (USANYS) <NTekeei@usa.doj.gov>
Subject: RE: Archer

Really? Sorry about that. I'm on the road and it was filed in my absence.

We'll file a corrected version. Let me know if there's anything in particular you want ASAP; to my memory all of the attachments were court filings and correspondence with your office.

-mls

Matthew L. Schwartz
BOIES SCHILLER FLEXNER LLP
212-303-3646 (Direct)
646-337-5787 (Mobile)

-----Original Message-----

From: Quigley, Brendan (USANYS) [Brendan.Quigley@usdoj.gov]
Sent: Friday, January 19, 2018 06:42 PM Eastern Standard Time
To: Matthew L. Schwartz
Cc: Mermelstein, Rebecca (USANYS); Tekeei, Negar (USANYS)
Subject: Archer

Matt-

I don't think you filed, or we otherwise received, the exhibits attached to your declaration. Could you please provide them to us as soon as possible?

Thank you.

Brendan F. Quigley
Assistant U.S. Attorney
Southern District of New York
(212) 637 2190 (w)
(347) 578 4999 (c)

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